



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

24 December 2015

Mr. David B. Conroy  
USEPA, Region 1  
5 Post Office Square – Suite 100  
Boston, MA 02109-3912

Dear Mr. Conroy:

The Rhode Island Department of Environmental Management, Office of Air Resources (OAR) is requesting from EPA a source determination for the three entities (Rhode Island Resource Recovery Corporation, Broadrock Gas Services LLC and Rhode Island LFG Genco, LLC) that own and/or operate various aspects of the Central Landfill and its gas collection and control system located in Johnston, RI.

### **Description of the Facility**

The Central Landfill is an integrated solid waste management facility located on a site comprising approximately 1100 acres. The primary solid waste management activity at the site is the operation of a municipal solid waste landfill. The Rhode Island Resource Recovery Corporation owns and operates the landfill. The requirements of 40 CFR 60, Subpart WWW apply to the landfill.

Landfill gas from the facility is captured and collected. Broadrock Gas Services LLC owns and operates the landfill gas collection system. American Environmental Group, Ltd. operates and maintains the landfill gas collection system under a contract with Broadrock Gas Services LLC.

The captured landfill gas is sent to a gas collection and conditioning (GCC) system before being combusted in four combustion turbines which generate electricity. The GCC system and combustion turbines are owned and operated by Rhode Island LFG Genco, LLC. Rhode Island LFG Genco LLC is a subsidiary of Broadrock Gas Services LLC.

Additionally, Rhode Island LFG Genco LLC owns and operates four reciprocating internal combustion engines and one enclosed flare that are capable of combusting landfill gas that has been filtered, dewatered, and compressed prior to being combusted. Broadrock Gas Services LLC owns and operates one enclosed flare and six candlestick flares capable of combusting landfill gas.



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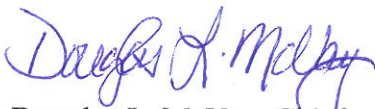
**Request from OAR**

OAR is asking EPA for the following determination:

- Should Rhode Island Resource Recovery Corporation, Broadrock Gas Services LLC and Rhode Island LFG Genco LLC be considered a single stationary source or separate stationary sources (or some hybrid) under PSD, nonattainment new source review and Title V?

Feel free to call or e-mail me to discuss or with any questions. I can be reached at 401-222-2808, x-7011 or at [doug.mcvay@dem.ri.gov](mailto:doug.mcvay@dem.ri.gov).

Sincerely,



Douglas L. McVay, Chief  
Office of Air Resources